

EXHIBIT A

Porter, Katherine

From: Hoff, Robert <RHoff@wiggin.com>
Sent: Friday, December 20, 2019 10:54 AM
To: Hurley, Mitchell; paul.lafata@dechert.com
Cc: Porter, Katherine; lindsey.cohan@dechert.com; marshall.huebner@davispolk.com; charles.duggan@davispolk.com; margarita.clarens@davispolk.com; kathryn.benedict@davispolk.com; chautney.mcmillian@davispolk.com; Preis, Arik; Miller, Allison; Atkinson, Michael (External); rringer@kramerlevin.com; andrew.troop@pillsburylaw.com; dackerman@motleyrice.com; sandy.alexander@state.ma.us; gillian.feiner@state.ma.us
Subject: RE: Purdue - Document Collection Questions

Counsel:

I am responding to your requests for information about document collections and custodial information. I put this information together before I saw the letter you sent last evening, but this information responds to what we discussed during our December 17 telephone call and parts of your recent letter.

You asked for the list of search terms used in the MDL to collect documents for review. Here are those terms:

1. Oxy* OR MSContin OR MS-Contin OR "MS Contin" OR Dilaudid OR Butrans OR Hysingla OR Targiniq OR Ryzolt OR (Region w/2 (zero OR 0)) OR ORT OR ORF OR OTR
2. Opioid* OR opiate* OR opoid* OR opiod* OR ER-LA
3. Painkiller* OR pain-killer* OR "pain killer" OR "pain med*" OR "pain manag*" OR "pain pill"
4. "steady state" OR "steady-state" OR "extended release"
5. ((Perry OR Dr) w/3 Fine) OR ((Dr OR Scott) /3 Fishman) OR ((Dr OR Steve*) /3 Stanos) OR (Russ* /3 Portenoy) OR ((Lynn OR Dr) w/3 Webster) OR (Derek /3 McGinnis) OR (Beth /3 Dove) OR ((Dr OR Brad*) /3 Galer) OR ((Allan OR Dr) w/3 Gordon) OR (John /3 Eisenhower) OR ((Dr OR Kath*) /3 Foley) OR (Chris* /3 Miaskowski) OR (Dwight /3 Moulin) OR ((Dr OR Steve*) /3 Passik) OR (Pete* /3 Watson) OR ((Dr OR Michael OR Mike) /3 Brennan) OR ((Dr OR Gord*) /3 Mortensen) OR ((Dr OR Shailesh) /3 Gandhi) OR ((Dr OR Lawrence OR Larry) /3 Robbins) OR ((James OR Jim OR Dr) w/3 Wilson) OR ("Mary Beth" /3 Partyka) OR ((Dr OR Dan*) w/3 Hurley) OR (Elton /3 Dixon) OR (Jud* /3 Paice) OR (Lisa /3 Weiss) OR ((Dr OR Jeff*) w/3 Alexander) OR ((Dr OR Ebby) /3 Jido) OR (Dickson /3 Wu) OR ((Dr OR Andrew) /3 Kolodny) OR (Gary w/3 Franklin)
6. (pill mill*) OR (suspicious /10 prescrib*) OR ((DEA OR "Drug Enforcement Agency) AND (report* OR notif* OR submit*)) OR (PhrMA AND Code)
7. Pseudo*addict* OR pseudo-addict* OR (pseudo* w/20 addict*)
8. NSAID* OR "nonsteroidal anti*inflammatory"
9. "Prescription* Monitor* Program*" OR PMP OR PDMP
10. Prescriberresponsibly* OR letstalkpain* OR inthefaceofpain* OR partnersagainstpain* OR painedu* OR painknowledge* OR emergingsolutionsinpain* OR smartmovessmartchoices *
11. "Model Guidelines for the Use of Controlled Substances for the Treatment of Pain" OR "Responsible Opioid Prescribing" OR "The Use of Opioids for the Treatment of Chronic Pain" OR "Managing Patient's Opioid Use: Balancing the Need and Risk" OR "Avoiding Opioid Abuse While Managing Pain" OR "Safe Opioid Prescribing" OR "Chronic Pain Management and Opioid Use" OR "Covering Pain and its Management" OR "Exit Wounds" OR "Treatment Options: A Guide for People Living with Pain" OR "Optimizing Opioid Treatment for Breakthrough Pain" OR "Breakthrough Pain: Improving Recognition and Management" OR "Opioid-Based Management of Persistent and Breakthrough Pain" OR "Opioid Medications and REMS: A Patient's Guide" OR "The Management of Persistent Pain in Older Persons" OR "Pharmacological Management of Persistent Pain in Older Persons" OR "Addiction Rare in Patients Treated with Narcotics" OR "Pain Medicine News"
12. (abus* w/3 deter*) OR ADF

13. Naloxone OR buprenorphine OR methadone OR suboxone OR Narcan OR naltrexone OR Revia OR Vivitrol OR Bunavail OR Zubsolv
14. "American Geriatric* Society" OR "AGS" OR "Pain Foundation" OR "NPF" OR "AAPM" OR "(Academy w/3 ("Pain Medic*")) OR "ACPA" OR (Chronic w/3 Pain w/3 Association) OR "APS" OR (Pain w/3 Society) OR "CPDD" OR (College w/4 "Drug Dependence") OR "JCAHO" OR "JACHO" OR "5th vital" OR ("Joint Commission" w/4 "Health Care Organization*") OR "JCS" OR "Will Rowe" OR "APF" OR ((Academy OR Society) w/3 Pain w/3 (Management) OR "NTPC" OR "National Initiative on Pain Control" OR "NADDI" OR (Association w/2 "Drug Diversion") OR "FBI-LEEDA" OR "Law Enforcement Executive Development" OR (Society w/3 Addiction w/3 Medicine) OR "ASAM" OR "ILSAM" OR "State Medical Board*" OR "FSMB" OR "American Osteopathic Association" OR "ASPMN" OR "ASPE" OR "PPSG" OR "Academy of Integrative Pain" OR "AIPM" OR ("Responsible Opioid Prescribing") OR "PROP" OR ("American Association" w/2 "Treatment of Opioid*") OR "AATOD" OR "Alcohol Drug Abuse Directors" OR "NASADAD" OR "Society of Interventional Pain" OR "ASIPP" OR "Anti-Drug Coalition*" OR "CADCA" OR "Pain Care Forum" OR PCF OR "Pain Control" OR IDPFR OR "Illinois Department of Professional Regulation" OR CDC OR "Center* for Disease Control"
15. Heroin OR Herin OR Herion OR Narco*
16. Oxycodone OR Morphine OR Hydrocodone OR Hydromorphone OR Hydromorphine OR Buprenorphine OR Fentanyl OR Tapentadol OR Oxymorphone OR Codeine
17. Analgesic* OR NSAID OR acetaminophen OR APAP OR adjuvant
18. Whale*

You asked for the list of email addresses that were used to collect documents from Drs. Richard and Kathe Sackler in the MDL. Those email addresses are:

Kathe Sackler

[REDACTED]

Richard Sackler

[REDACTED]

You asked what other Sackler family members had a Purdue email account. These are the individuals who had Purdue email accounts and who were once officers or Board members of Purdue:

[REDACTED]

[REDACTED]

We will be responding further to other issues raised during the December 17 call and your recent letter.

Regards,
Rob

Robert S. Hoff

Wiggin and Dana LLP

Direct: 203.363.7626 | [REDACTED] | rhoff@wiggin.com | v-Card

www.wiggin.com

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From: Hurley, Mitchell <mhurley@akingump.com>

Sent: Monday, December 16, 2019 3:16 PM

To: paul.lafata@dechert.com

Cc: kporter@akingump.com; lindsey.cohan@dechert.com; Hoff, Robert <RHoff@wiggin.com>; marshall.huebner@davispolk.com; charles.duggan@davispolk.com; margarita.clarens@davispolk.com; kathryn.benedict@davispolk.com; chautney.mcmillan@davispolk.com; apreis@akingump.com; amiller@akingump.com; matkinson@provincefirm.com; rringer@kramerlevin.com; andrew.troop@pillsburylaw.com; dackerman@motleyrice.com; sandy.alexander@state.ma.us; gillian.feiner@state.ma.us

Subject: RE: Purdue - Document Collection Questions

WARNING! External email. Do not click/open unexpected links/attachments.

Let's schedule this call for a time that both you and Rob are available please, hopefully tomorrow afternoon/evening. Do you have windows that work on your end? I have added to this email reps from the two public ad hoc groups who we think should participate as well, including for the sake of efficiency.

In the meantime, would you please circulate the custodians, date ranges and search terms used to gather documents in connection with the MDL?

From: LaFata, Paul <Paul.LaFata@dechert.com>

Sent: Monday, December 16, 2019 9:12 AM

To: Hurley, Mitchell <mhurley@AkinGump.com>

Cc: Porter, Katherine <kporter@akingump.com>; Cohan, Lindsey <Lindsey.Cohan@dechert.com>; EXT RHoff@wiggin.com <RHoff@wiggin.com>; Huebner, Marshall S. <marshall.huebner@davispolk.com>; Duggan, Charles S.

<charles.duggan@davispolk.com>; Clarens, Margarita <margarita.clarens@davispolk.com>; Benedict, Kathryn S. <kathryn.benedict@davispolk.com>; McMillian, Chautney R. <chautney.mcmillian@davispolk.com>; Preis, Arik <apreis@akingump.com>; Miller, Allison <amiller@akingump.com>; Atkinson, Michael (External) <matkinson@provincefirm.com>

Subject: Re: Purdue - Document Collection Questions

Mitchell — Rob wiggin and Dana is not available today, though I agree that it would be important to have him on the call. I am in flight all day tomorrow but could do something like 6:30 est

Paul LaFata
Counsel

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On Dec 15, 2019, at 6:19 PM, Hurley, Mitchell <mhurley@akingump.com> wrote:

Thanks Paul. I see Wiggin Dana is copied on your email, and understand it will be important for them to participate as well given their role in discovery. Also, we would like to invite reps of the consenting and dissenting groups to the call. Please let us know if you object. Regards, Mitch

Sent from my iPhone

On Dec 15, 2019, at 8:20 AM, LaFata, Paul <Paul.LaFata@dechert.com> wrote:

****EXTERNAL Email****

Hi Katherine — I believe that we can answer a lot of your questions in a call and can make sure that there is no confusion about some of these issues and in the below recital. The bottom line will be that Purdue did a thorough collection review and production of these documents within its own files, and we can walk through it.

I could join a call tomorrow at 6pm est if others are available.

Paul

Paul LaFata
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On Dec 13, 2019, at 9:28 PM, Porter, Katherine <kporter@akingump.com> wrote:

Dear Paul, Lindsey, Rob:

We are writing because we need to understand the degree to which Sackler emails have been searched and produced in connection with the pre-petition litigation (and we use that term inclusively as it relates to opioid-related litigation in which Purdue or the Sacklers were involved) and any investigations or inquiries. We spoke today with Charles from Davis Polk who explained that we should direct our questions on these matters to Dechert.

We understand that Richard Sackler individually produced only about 200 documents in the MDL, of which approximately 100 were emails. We understand that no other Sackler or shareholder party has made any other productions of his or her own documents in the MDL or state court litigations. We are still waiting to be informed about productions in other contexts. Please advise promptly if we are mistaken, or if you have any additional information concerning the Sacklers' productions.

We further understand that, in connection with the MDL, Purdue initially refused to designate any Sackler as a custodian for the company's document collection, review and production (or to conduct any search of any Sackler's company emails and files). We understand that later in the MDL, the company added Richard and Kathe Sackler as custodians and produced approximately 25,000 documents from Richard and Kathe's files. Would you please confirm whether this understanding is accurate – or please correct whatever I may have misstated about the company's search and production of any Sackler's files?

If any searches of any Sackler's files were conducted, please provide the parameters of those searches: e.g., the date range, the terms used, accounts searched, the name of the email address searched, etc., for each Sackler custodian.

Separate from the searches and productions made to plaintiffs, we would ask that you please confirm whether the Debtors (or the special committee) are conducting any internal search and review of files of the Sacklers or where Sacklers are custodians? To the extent that this question is more properly addressed to DPW, we would ask that Charles and Margarita (who are copied) please respond. Further, to the extent such search/review occurred, please provide the date range, the terms used, accounts searched, the name of the email address searched, etc., as well as the documents gathered as a result.

We would also appreciate if you could please provide a complete list of all Sackler email addresses. To the extent any such email addresses

were not searched, could you please explain why they were not searched?

For reasons that I am sure you understand, the Committee believes that is critical that a thorough review of all of the Sackler's company files be conducted before any settlement of claims against the Sacklers can be evaluated. Please advise whether you are available to discuss these points this weekend or early next week.

Many thanks for helping us to understand these discovery questions.

Best,
Katherine

Katherine Porter

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